REMARKS

I.   **Status of the Application**

Claims 1-4, 6-8, 10-12, and 14-16 are pending in this application. In the August 8, 2008 office action, the Examiner:

A.   Rejected claims 1, and 6-7 under 35 USC §112, second paragraph for failing to particularly point out and distinctly claim the subject matter that the applicant regards as his or her invention;

B.   Rejected claims 1, 6-7, 10-12, and 14-15 under 35 USC §103(a) as being unpatentable over Santosuosso (U.S. Publication No. 2003/0093400) in view of Armstrong (U.S. Publication No. 2002/0078083); and

C.   Rejected claims 2-4, 8, and 16 as being obvious over Santosuosso in view of Yamada (US Publication No. 2006/0058982).

In this response, Applicants have amended claims 1 and 10. Applicants respectfully traverse the rejection of the claims and request reconsideration in light of the foregoing amendments and following remarks.

II.   **Section 112 Ground of Rejection**

Claim 1 was rejected because the Examiner asserted that an insufficient antecedent basis existed for "a document management system" in line 2 of the claim. That language has been deleted from the claim. Therefore, Applicant submits the ground of rejection is moot.

Claims 6 and 7 were rejected under 35 U.S.C. 112, second paragraph

because "document production system" had an insufficient antecedent basis in claim 4. The Examiner required amendment of claims 6 and 7 to depend from claim 1. Applicant respectfully disagrees. Claims 6 and 7 refer to document production system messages. These messages are referenced in claim 4, but not in claim 1. Therefore, claims 6 and 7 must depend from claim 4; otherwise the limitation "document production system messages" will lack an antecedent basis. Because claim 4 depends from claim 2 and claim 2 depends from claim 1, the antecedent basis for document production system in claims 6 and 7 are properly provided by claim 1. Therefore, Applicant requests withdrawal of the section 112 ground of rejection with regard to claims 6 and 7.

III.   **Section 103 Ground of Rejection**

Claims 1, 6-7, 10-12, and 14-15 as being unpatentable over Santosuosso in view of Armstrong.

Claim 1 was rejected as being obvious over Santosuosso in view of Armstrong. Claim 1 has been amended to clarify the invention as defined by claim 1. For the reasons discussed below, Santosuosso fails to teach, show or suggest each and every limitation of claim 1, as amended.

Claim 1 is directed to a system that enables communication of variable data between a data management system and a document production system through a message bridge. Claim 1 has been amended to state that the message bridge requires:

> a message bridge for coupling the data management system to the document production system to enable the document production system and data management system to communicate data messages that enable the proofing of the document layout

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at the document designing station and generation of the at least one document populated with the variable data at the layout processor.

The message bridge enables communication of data messages between the database management system and the document production system in order to streamline the generation and printing of the documents containing variable data obtained from a database of the data management system. The data messages communicated through the message bridge enable document layout proofing at the document designing station and generation of a document with variable data at the layout processor.

Santosuosso is directed to a method for updating a database with information obtained from a browser. In particular, Santosuosso is directed to updating information in a database utilizing information from a user's browsing session. *Santosuosso*, para. [0008]. In the system of Santosuosso, the browser program 130 executes on client 140 to navigate between various web servers 110 on a network 150 and to locate network addresses at one or more of the web servers. *Santosuosso*, para. [0032]. A browser monitor program 134 monitors the browser program and determines whether a page redirect or page change event has occurred. *Santosuosso*, paras. [0035]-[0036]. If either event occurs, the browser monitor program 134 generates a change request that is processed by the browser request handler 172 of the database server 170 in server system 120 to update data tables in the database managed by the server 170. *Santosuosso*, paras. [0038]-[0040].

The data used to update the databases in the server system 120 are received directly from the browser monitor program executing in the client 140. That is, the URL changes and/or the other page changes come from the browser monitor program, and not the web server. The browser program executing in the client 140 communicates directly with one or more web servers 110. Thus, the web server 110 does not couple the client 140 to the server system 120 and does not communicate data messages between the two systems "for the proofing and generation of documents populated with variable data" as asserted by the Examiner. Thus, Santosuosso does not teach or suggest the message bridge required by claim 1.

The deficiencies of the cited combination are especially apparent in light of amended claim 1 and the newly asserted reference combination. The amended claim 1 requires the message bridge to couple the data management system to the document production system to enable communication of data messages that enable the proofing of the document layout at the document designing station and the generation of at least one document with variable data at the layout processor. In the Office Action, the Examiner admits that Santosuosso fails to teach or disclose a document production system. *Office Action*, page 4, lines 11-20 (Applicant assumes the reference to Armstrong in this paragraph is a typographical error because the Examiner states the exact opposite in the next paragraph beginning on page 4 and substituting the word "Santosuosso" for Armstrong on line 11 of page 4 is consistent with the Examiner's remarks at page 7, line 4). To provide Santosuosso with a document production system, the

Examiner substitutes the document production system of Armstrong as interpreted by the Examiner for the client of Santosuosso. *Office Action*, page 3, last partial paragraph, and page 4, lines 16-18. This understanding seems reasonable because the Examiner identifies the database server 170 in Santosuosso with the data manager of claim 1. If the Examiner substituted the document production system of Armstrong for the server system 120, the Examiner would lose the database server 170, which he equates with the data manager of claim 1. The combination, interpreted in this manner, however, would result in the document production system identifying changed data for document layout and generation and no variable data would be obtained by the document production system from the data manager and the database as required by claim 1. Thus, the cited combination fails to arrive at the claimed invention. Consequently, the Examiner has failed to present a *prima facie* case of obviousness and the ground of rejection should be withdrawn.

Claims 6 and 7 depend indirectly from claim 1 through claims 4 and 2. The section 103 ground of rejection of claims 6 and 7 must fail for at least two reasons. For one, claims 6 and 7 include the limitations of claim 1 and, as already noted, claim 1 is patentable over all references of record, either alone or in combination. Also, the Examiner failed to consider the limitations presented in claims 4 and 2 in the rejection of claims 6 and 7. Therefore, the section 103 ground of rejection of claims 6 and 7 should be withdrawn.

Claim 10 is an independent claim that includes a limitation similar to the limitation discussed above with reference to claim 1. For reasons similar to those

discussed above regarding claim 1, claim 10 is also patentable over all references of record, either alone or in combination.

Claims 11-12 and 14-15 depend directly or indirectly from claim 10. Therefore, these claims include the limitations of claim 10 and, as already noted, claim 10 is patentable over all references of record, either alone or in combination.

Claims 2-4, 8, and 16 as being unpatentable over Santosuosso in view of Yamada.

Claim 2 depends from claim 1. Thus, the invention of claim 2 includes the limitations discussed above, including the document production system. Also, as noted above, the Examiner admitted that Santousosso does not teach or suggest a document production system. In the rejection of claim 2, the Examiner did not assert that Yamada contains a document production system. Consequently, the section 103 ground of rejection based on Santosuosso and Yamada does not adequately support a *prima facie* case of obviousness.

Even if the Examiner intended to reject claim 2 as being unpatentable over Santosuosso in view of Armstrong and in further view of Yamada, the rejection would fail. As discussed above, claim 1 is not rendered obvious by Santosuosso in view of Armstrong. Because a properly supported rejection of claim 1 has not been presented, claim 2 is likewise patentable. Likewise, claims 3-4 and 8, which also depend on claim 1, either directly or indirectly, contain the limitations of claim 1 that have not been rendered obvious by the references of record.

Claim 16 includes the limitations of claim 10. Because a properly supported rejection of claim 10 has not been presented, claim 16 is likewise

patentable as it contains the limitations of claim 10 that have not been rendered obvious by the references of record.

IV.   Conclusion

For the reasons set forth above, all pending claims have been amended and are patentable over all references of record. Reexamination and allowance of all pending claims are earnestly solicited.

Respectfully submitted,
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